

**IOWA TELECOM** 

115 S. Second Avenue West Newton, Iowa 50208-1046 (641) 787-2000 FAX (641) 787-2001

February 6, 2006

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Attention: Enforcement Bureau

Re:

EB-06-TC-060; EB Docket No. 06-36

Section 64.2009(e) Compliance

Iowa Telecommunications Services, Inc.

Certification of CPNI Filing (February 6, 2006)

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 64.2009(e), please find attached a certificate of compliance with 47 C.F.R. § 64.2009 and a statement of operating procedures ensuring such compliance. This filing is in response to the Public Notice issued by the Commission January 30, 2006, *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, (DA-06-223).

As directed, a copy of this report has been sent to Byron McCoy of the Commission's Enforcement Bureau, Telecommunications Consumers Division.

Please contact Barbara E. Bouley at (641) 787-2396 if you have any questions regarding this matter.

Sincerely

D. M. Anderson

Vice President – External Affairs

Carrier's Name: Iowa Telecommunications Services, Inc.

Carrier's Address: 115 S. Second Ave. W., Newton, IA 50208-9954

Carrier's Telephone Number: 641-787-2347

Filer 499 ID: 820463

Attachments

## **CERTIFICATION OF CPNI FILING**

## **February 6, 2006**

I certify that I am an officer of Iowa Telecommunications Services, Inc., that I have reviewed the established operating procedures for customer proprietary network information ("CPNI") and that to the best of my knowledge, information, and belief, the operating procedures are adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. §222) and 47 CFR §§64.2001-64.2009.

PRINTED NAME: D. M. Anderson

POSITION: Vice President - External Affairs and Marketing

SIGNATURE:

DATE: February 6, 2006

(Persons making willful false statements in this report form can be punished by fine or imprisonment pursuant to 47 U.S.C. § 220(e).)

CONTACT PERSON: Barbara E. Bouley

TELEPHONE NUMBER: 641-787-2396

## Iowa Telecommunications Services, Inc.

## **CPNI Compliance Statement**

Iowa Telecommunications Services, Inc. ("Iowa Telecom") has the following safeguards in place to ensure compliance with Section 222 of the Communications Act of 1934, as amended.

- Personnel (both sales and marketing) receive training as to when they are and are not authorized to use CPNI, and an express disciplinary procedure is in place when an Iowa Telecom policy is not followed. Training is included as part of the initial training and refresher training as required.
- Iowa Telecom has a procedure to send a welcome informational packet to all new customers that includes an explanation of customer proprietary network information ("CPNI") and a form to submit to the company if they choose to optout of the use of their CPNI.
- The Iowa Telecom website provides information regarding CPNI and a link to email the company to request opting-out of the use of a customer's CPNI. The customer can also dial 611 from any Iowa Telecom telephone and request optingout of the use of the CPNI on their account.
- Biennial notification is sent to all customers.
- CPNI is not provided to or disclosed to third parties.
- Records are retained at least one year of the sales and marketing campaigns using CPNI. The records include a description of each such campaign, the dates and purpose of the campaign, the specific CPNI used, and the products and services offered).
- Supervisory approval is required to develop out-bound marketing plans for mailings and calling campaigns.